

# Fact Sheet



## *For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 16, 2009

Permit Number: **R30-05100011-2009**  
Application Received: **January 11, 2011**  
Plant Identification Number: **051-00011**  
Permittee: **Rain CII Carbon LLC**  
Facility Name: **Moundsville Calcining Plant**  
Mailing Address: **3 Energy Road; Moundsville, WV 26041**

Permit Action Number: *MM02*    Revised: *April 19, 2011*

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Physical Location:	Moundsville, Marshall County, West Virginia
UTM Coordinates:	515.30 km Easting • 4409.20 km Northing • Zone 17
Directions:	Drive south on Rt. 2 from Moundsville, the plant is about 10 miles south and is on the right (Ohio River side of route 2), between the AEP Kammer and Mitchell power plants.

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### **Facility Description**

This onshore calcining plant calcines raw (green) coke. Raw coke can be petroleum coke of various forms, which is a solid byproduct of the refining of petroleum, or any other carbonaceous material that can be calcined. The plant is mainly a solids handling facility.

Facility SIC Codes:      2895 - Chemicals and Allied Products - Carbon Black  
                                 2999 - Petroleum Refining and Related Industries - Petroleum and Coal Products.  
                                 3229 - Stone, Clay, Glass, and Concrete Products - Pressed and Blown Glass, NEC

This modification adds five (5) existing emergency generator engines to this permit. This modification also incorporates placeholder language for applicable portions of 40 CFR 63, Subpart ZZZZ (RICE MACT) requirements and incorporates greenhouse gas reporting requirements.

## Emissions Summary

Since this modification involves existing equipment, no emission changes are associated with this modification.

## Title V Program Applicability Basis

This facility maintains the potential to emit over 100 tons per year of Carbon Monoxide, Nitrogen Oxides, PM<sub>10</sub>, and Sulfur Dioxide; and over 10 tons per year of Nickel compounds. Due to this facility's potential to emit over 100 tons per year of criteria pollutants and over 10 tons per year of a single HAP, Rain CII Carbon LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	40 CFR 63, Subpart ZZZZ	RICE MACT.
	45CSR13	Construction permits
	45CSR30	Operating permit requirement.
State Only:	45CSR42	Greenhouse gas reporting.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
None	N/A	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

### Changes Made with This Modification

The following changes were made with this permit modification:

- The emergency generator engines (EN-01, EN-02, EN-03, EN-04, EN-05) were added to the Emission Units table.
- Conditions 3.1.10 and 3.5.10 were added to address greenhouse gas recordkeeping requirements from 45CSR42.
- Condition 3.1.11 was added requiring Rain CII Carbon LLC to comply with all portions of 40 CFR Part 63, Subpart ZZZZ by the initial compliance deadline of May 3, 2013.

### 40 CFR 63, Subpart ZZZZ RICE MACT Applicability

The five emergency generator engines added with this modification are diesel-fired and rated between 36-130 hp. As stated below, the engines meet the definition for reciprocating internal combustion engines (RICE) according to 40 CFR § 63.6685(a) :

A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

RICE within the horsepower range for these five engines fit into the less than or equal to 500 hp category as established by the regulation.

### Placeholder Language

Rain CII requested that only placeholder language for the RICE MACT be added with this modification. Rain CII will request a modification to this Title V permit in early 2013 to add the detailed RICE MACT compliance requirements for their emergency engines at that time.

### Non-Applicability Determinations

None.

### Request for Variances or Alternatives

None.

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### Comment Period

Beginning Date: N/A  
Ending Date: N/A

### Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Point of Contact**

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**Response to Comments**

Not applicable.